

AS Eesti Post Principles of Processing Customer Data

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Overview

Eesti Post with the international name **Omniva** is a logistics company operating with the aim of creating value for its customers in offering postal, parcel and information logistics services by developing, combining and managing networks and systems necessary for such purposes by means of profit earned as a result of its economic activities. Additionally, Omniva provides financial, warehouse and customs broker services and is active in wholesale and retail sale.

Omniva Group includes AS Eesti Post as the parent company and Maksekeskus AS in Estonia, Omniva LT UAB in Lithuania and Omniva SIA in Latvia as subsidiaries. The Group also includes the affiliated company Postil OÜ. In terms of ownership, Omniva is a wholly state-owned enterprise.

Information on processing personal data applies to the personal data of natural persons, excluding data of enterprises and other legal persons and institutions. The information provided is also valid for personal data of natural persons engaged in professional and occupational activities (e.g. employees of enterprises and organisations). If a natural person interacts with Omniva as a person connected to a business customer, Omniva registers and uses (personal) data regarding a such natural person. The mentioned legal persons may be connected to our customers, e.g. as signatories, members of the board, employees, guarantors, pledgers or any third persons connected to our customers.

Principles underlying processing of customer data by Omniva have been described in the current principles of processing customer data (hereinafter **Principles**).

Principles are applied when a customer uses, has used or has expressed interest in using one of the services provided by Omniva or is in any other way connected to a service; Principles are applied to customer relations established prior to the Principles coming into force.

The Principles are also binding to all Omniva's contractual partners providing services for or on behalf of Omniva and processing Omniva's customer data.

Processing of customer data is conducted according to the Personal Data Protection Act, Postal Act, General Data Protection Regulation and other legal acts, current Principles and/or agreements entered or to be entered into with a specific customer, including standard terms and conditions applicable to specific services.

Omniva has the right to unilaterally change these Principles by notifying the customer of such a change in a post office, on its website www.omniva.ee or via other means (e.g. through mass notification means).

1. Definitions

Personal Data means any data that is identified about or is about a **natural person** irrespective of the shape or form the data is in.

Customer means any natural person or legal person that uses or has expressed the will to use services provided or facilitated by Omniva.

Data Subject means **any natural person** regarding whom Omniva holds data enabling their identification. Data Subjects include potential future, current and former Customers, users of Omniva's services or their representatives, cooperation partners, persons doing queries and visitors.

Postal Secrecy means confidentiality of all information pertaining to the contents of a postal item and concerning the postal traffic of a specific person.

Processing means any procedure performed regarding Customer Data, including gathering, recording, storing, altering, granting access to, deleting, doing queries, forwarding, organising, using, distributing, etc.

Customer Data means any information that Omniva is aware about the Customer (e.g. name, personal identification code, contact information, etc.). Customer Data also includes data and personal data being processed as Postal Secrecy.

2. General Provisions

Omniva ensures the confidentiality and legality of the Processing of Customer Data with regard to applicable law and implements appropriate technical and organisational measures to protect Customer Data from unauthorised access, unlawful Processing or disclosure and accidental loss, alteration or destruction.

Omniva Processes all Customer Data that it has been made aware about the Customer during a transactional relationship according to the purpose of Processing Customer Data.

Omniva may for the purpose of Processing Customer Data engage contractual partners that during Processing are obligated to follow these Principles and Omniva's instructions, implement appropriate security measures and ensure the legality and confidentiality of Processing of Customer Data. Omniva ensures that contractual partners Process Customer Data based on Omniva's instructions and applicable law and implement appropriate security measures. Contractual partners have the right to Process Customer Data only to the extent necessary for fulfilling objectives specified by Omniva.

3. Objectives of Processing Customer Data

Omniva processes Customer Data in order to:

- determine if and on what conditions to provide a service to a Customer (Customer Data Processing preceding the conclusion of an agreement);
- evaluate the Customer's creditworthiness;
- fulfil the agreement concluded between Omniva and the Customer;
- offer/provide Omniva's services to the Customer;
- exercise its rights arising from the agreement concluded with the Customer or agreements connected to a service provided to the Customer;
- determine service charges amounts;
- group and segment Customers based on various criteria to ensure the quality of services;
- avert losses incurring to Omniva;
- minimise and exclude risks (e.g. obstruct money laundering, etc.);
- organise consumer games and campaigns (including SMS campaigns);
- better understand the Customer's expectations (via market research, customer surveys, mapping of consumer habits, etc.);
- offer services and/or goods provided by cooperation partners;
- review, correct and complete Customer Data;
- fulfil its obligations arising from legal acts (e.g. forwarding data to investigative bodies, fulfilling obligations arising from legal acts while providing services, etc.);
- defend its violated and contested rights.

4. Composition of the Processed Customer Data

Omniva processes, among others, but not limited to, the following Customer Data:

Customer's personal data (e.g. name, personal identification code, spoken language, identity document data, etc.);

Customer's contact data (e.g. address, phone number, e-mail address, etc.);

Communication data, e.g. visual recordings of the Customer visiting post offices, postal stations, parcel machines or other locations where Omniva provides services or of the Customer communicating with Omniva via phone or other data collected via e-mail or other communication environments, e.g. social media, the Customer visiting Omniva's home page, etc.;

Data regarding transactions and agreements connected to them (including regarding the Customer's rights and fulfilment or unsatisfactory fulfilment of obligations, e.g. connected to concluded and/or terminated agreements, made arrangements, submitted statements and applications, data about agreement breaches, etc.);

Data received as a result of fulfilling obligations arising from law (e.g. data from investigative bodies, court inquiries, etc.);

Data regarding the Customer's habits, preferences and satisfaction (e.g. customer satisfaction, data regarding complaints, services used, etc.);

Data regarding participation in consumer games and campaigns (e.g. data regarding prizes won in consumer games or campaigns, etc.);

Data about the Customer's trustworthiness (e.g. data regarding payment disruptions, losses caused to Omniva or third parties, money laundering, financing terrorism or being connected to organised crime, etc.);

5. Processing of Customer Data without the Customer's consent

Pursuant to section 34 of the Postal Act, Omniva has the right to collect and Process Personal Data regarding Customers for the preparation and maintenance of an address register used for the provision of postal services.

Omniva Processes Customer Data without the Customer's consent only as provided by law (e.g. personal data regarding senders and addressees based on the Postal Act, data regarding parties to an agreement for the performance of the agreement based on the Law of Obligations Act, data regarding the person concluding the agreement based on the Money Laundering and Terrorist Financing Prevention Act, data regarding the person performing the transaction based on the Accounting Act, etc.).

6. Geographical area of Processing

Customer Data is Processed within the European Union/European Economic Area (EU/EEA), however, in certain cases, Customer Data is forwarded to countries outside the EU/EEA.

Forwarding and Processing of Personal Data outside the EU/EEA is conducted based on a legal basis, e.g. fulfilling a legal obligation or Customer's consent, and appropriate safety measures.

7. Data storage period

Customer Data is not Processed longer than necessary. Storage period is based on agreements concluded with the Customer, Omniva's legitimate interests or applicable law (e.g. acts related to accounting, limitation period, preventing money laundering and other private law).

8. Customer's rights

Inspection of Personal Data

The Customer has the right to inspect Personal Data collected and used regarding them, the sources of such data and the objectives of their use. The Customer has the right to request information regarding the

storage period and recipients of their data and the extent their data is disclosed to such recipients. The Customer's right to inspect their data may be limited by legislation in force, rights of other persons in ensuring their privacy and Omniva's operational needs. Omniva's know-how, business secret, internal assessments and materials may also be included in data that cannot be inspected.

Altering and deleting

If the Customer's data is incorrect, incomplete or irrelevant, the Customer has the right to have their data corrected or deleted, taking into consideration limitations arising from legislation in force and rights regarding processing of data. These rights are known as "the right to data rectification" and "the right to be forgotten".

Transferring

If Omniva uses Customer Data based on their consent or an agreement and Processing is automated, the Customer has the right to request a copy of the data they have provided in electronic machine-readable format.

9. Restricting the use of data

If the Customer believes that the data Omniva has collected concerning them is incorrect or the Customer has objected to the use of their data, they have the right to request Omniva to restrict the use of their data to storage. The use of data is restricted to storage until establishing the correctness of the respective data or establishing whether Omniva's legitimate interests carry more weight than the interests of the Customer.

If the Customer has the right to request their data to be deleted, the Customer has the right to instead require Omniva to restrict the use of their data to storage. If Omniva needs data collected concerning the Customer solely for claiming or defending legal claims, the Customer has the right to request Omniva to restrict the use of their data to storage. Nevertheless, Omniva may have the right to otherwise use data if needed for claiming legal claims or if such use is based on the Customer's consent.

10. Contact information

Customers have the right to contact Omniva regarding requests or withdrawal of consent and private customers also have the right to request exercising of their rights in Processing Personal Data and file complaints regarding the use of Personal Data.

Contacts of Omniva's Data Protection Officer:

AS Eesti Post

Pallasti 28, 10001 Tallinn, Estonia

E-mail: info@omniva.ee

If the Customer is unsatisfied with the Processing of their Personal Data by Omniva and contacting Omniva's Data Protection Officer did not achieve a satisfactory result, the Customer has the right to file a written complaint to:

AS Eesti Post

Pallasti 28, 10001 Tallinn, Estonia

E-mail: info@omniva.ee

Home page: www.omniva.ee

Additionally, the Customer has the right to file complaints regarding the use of their Personal Data to the Estonian Data Protection Inspectorate (web page: www.aki.ee) if they believe that based on applicable law, the Processing of their Personal Data violates their rights and interests.

The current Principles are available to Customers in post offices, postal stations and on Omniva's home page.

Policies applicable to Omniva's cookies are available on www.omniva.ee.